RECEIVED
CENTRAL FAX CENTER
DEC 18 2009

Listing of Claims:

1-6. (Canceled)

7. (Previously Presented) A computer-based risk management method for asymmetrically accounting an assessment in a stable value investment product, comprising the steps of:

using a computer to track an insurance policy stable value wrap agreement using computer calculated asymmetrical accounting where a stable value and market value is assessed at an insured level;

adjusting an assessment, by a computer, by a ratio of stable value of said stable value investment product to market value of said stable value investment product to provide an adjusted assessment;

in a computer, applying said assessment to said market value; and

applying said adjusted assessment to said stable value, wherein said market value and said stable value are maintained at the level of an individual insured, and wherein the level of put exposure following application of the assessment is unchanged relative to the level of put exposure prior to the application of the assessment.

8. (Canceled)

9. (Previously Presented.) The method of claim 7, wherein said assessment is at least on of the following: policy charges, cost of insurance charges, mortality risk, death benefit payment, mortality and expense (M&E) charges, asset based fees and investment fees.

10. (Previously Presented). The method of claim 7, wherein said stable investment product comprises a pooled mortality arrangement with a plurality of insureds; and further comprising the step of asymmetrically accounting a death benefit claim such that proceeds from said death benefit claim are recognized over an extended period of time.

11. (Previously Presented). The method of claim 10, further comprising the step of determining said proceeds by calculating a net amount of risk (NAR) of said death benefit claim.

12. (Previously Presented). The method of claim 10, further comprising the step of depositing said proceeds from said death benefit claim into said stable value investment product such that said market value of remaining insureds increases by said proceeds, but said stable value of said remaining insureds over time, thereby effectively increasing reset rate prospectively.

PAGE 3/10 * RCVD AT 12/18/2009 5:03:06 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-6/29 * DNIS:2738300 * CSID: * DURATION (mm-ss):04-14

13. (Previously Presented). A computer system for administering a stable value investment product, comprising:

a program controlled computer module for receiving as digital data inputs an assessment, a stable value of said stable value investment product and a market value of said stable value investment product;

a processing device for adjusting said assessment by a ratio of said stable value to said market value to provide an adjusted assessment, wherein said stable value and said market value are maintained at the level of an individual insured, deducting said assessment from said stable value to provide a new stable value, wherein the level of put exposure following application of the assessment is unchanged relative to the level of put exposure prior to the application of the assessment; and

a storage device for storing said new market value and said new stable value.

14. (Previously Presented). The administering system of claim 13, wherein said assessment is at least one of the following: policy charges, cost of insurance charges, mortality risk, death benefit payment, mortality and expense (M&E) charges, asset based fees and investment fees.

15. (Canceled).

16. (Previously Presented). The administering system of claim 13, wherein said stable investment product comprises a pooled mortality arrangement with a plurality of insureds; and wherein said processing device is operable to asymmetrically account a death benefit claim such that proceeds from said death benefit claim are recognized over an extended period of time.

17. (Previously Presented). The administering system of claim 16, wherein said processing device is operable to determine said proceeds by calculating a net amount of risk (NAR) of said death benefit claim.

18. (Previously Presented). The administering system of claim 16, wherein said processing device is operable to deposit said proceeds from said death benefit claim into said stable value investment product such that said market value of remaining insureds increases by said proceeds, but said stable value of said remaining insureds increases over time, thereby effectively increasing reset rate prospectively.

PAGE 4/10 * RCVD AT 12/18/2009 5:03:06 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-6/29 * DNIS:2738300 * CSID: * DURATION (mm-ss):04-14

19. (Previously Presented). A computer readable medium comprising programming code in computer memory for asymmetrically accounting an assessment in a stable value investment product, said code comprising instruction for:

adjusting an assessment by a ratio of stable value of said stable value investment product to market value of said stable value investment product to providc an adjusted assessment, wherein said stable value and said market value are maintained at the level of an individual insured;

applying said assessment to said market value;

applying said adjusted assessment to said stable value, wherein the level of put exposure following application of the assessment is unchanged relative to the level of put exposure prior to the application of the assessment.

20. (Previously Presented). The computer readable medium of claim 19, wherein said stable investment product comprises a pooled mortality arrangement with a plurality of insureds; and wherein said code further comprises instructions for asymmetrically accounting a death benefit claim such that proceeds from said death benefit claim are recognized over an extended period of time.

21. (Previously Presented). The computer readable medium of claim 19, wherein said code further comprises instructions for determining said proceeds by calculating a net amount of risk (NAR) of said death benefit claim.

22. (Previously Presented). The computer readable medium of claim 19, wherein said code further comprises instructions depositing said proceeds from said death benefit claim into said stable value investment product such that said market value of remaining insureds increases by said proceeds, but said stable value of said remaining insureds increases over time, thereby effectively increasing reset rate prospectively.

PAGE 5/10 * RCVD AT 12/18/2009 5:03:06 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-6/29 * DNIS:2738300 * CSID: * DURATION (mm-ss):04-14